

BAYARD, P.A.

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*Former Co-Counsel to the Official Committee of
Unsecured Creditors of Purdue Pharma L.P., et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
PURDUE PHARMA L.P., <i>et al.</i> , ¹)	Case No. 19-23649 (RDD)
Debtors.)	Jointly Administered

**FIFTH MONTHLY FEE STATEMENT OF BAYARD, P.A. FOR COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM JUNE 1, 2020 THROUGH JULY 15, 2020**

Applicant	Bayard, P.A.
Name of Client	Official Committee of Unsecured Creditors
Time Period Covered by Application	June 1, 2020–July 15, 2020 ²
Total Compensation Sought by Application	\$6,435.10

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² In February 2020, Cole Schotz P.C. replaced Bayard, P.A. as efficiency counsel to the Official Committee of Unsecured Creditors. All time and expenses incurred by Bayard, P.A. following such time have related to the fee application process.

Total Expenses Sought by Application	\$10.10
Petition Date	September 15, 2019
Date of Order Approving Employment	November 21, 2019 (<i>nunc pro tunc</i> to September 29, 2019)
Total Compensation Approved by Interim Order to Date	\$950,561.00 ³
Total Expenses Approved by Interim Order to Date	\$7,715.34
Total Compensation Paid to Date	\$940,919.60
Total Allowed Expenses Paid to Date	\$8,294.28
Blended Rate in Application for All Attorneys	\$414.81
Blended Rate in Application for All Timekeepers	\$389.39

This is Bayard's fifth monthly fee statement in these cases.

Bayard, P.A. ("Bayard"), former co-counsel to the Official Committee of Unsecured Creditors (the "Committee") of Purdue Pharma, L.P. and its affiliated debtors and debtors in possession (collectively, the "Debtors"), hereby submits this statement of fees and disbursements (the "Fifth Monthly Fee Statement") covering the period from June 1, 2020 through and including July 15, 2020 (the "Compensation Period") in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the "Interim Compensation Order") [D.I. 529]. By this Fifth Monthly Fee Statement, and after taking into account certain voluntary discounts and reductions, Bayard requests (a) interim allowance and payment of compensation in the amount of \$5,148.08 (80% of \$6,435.10) for fees on account of reasonable and necessary professional services rendered to the Committee by Bayard and

³ The fees requested Bayard's First Interim Fee Application were approved in the above amount pursuant to the Court's *Omnibus Order Granting First Interim Fee Applications of Professionals for Allowance and Payment of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses* [ECF No. 1159] (the "First Interim Fee Order"). Pursuant to the First Interim Fee Order, \$190,112.20 of the approved amount remain subject to holdback pending further order of the Bankruptcy Court in connection with the review of Bayard's fees by the independent fee examiner appointed in these cases.

(b) reimbursement of actual and necessary costs and expenses in the amount of \$10.10 incurred by Bayard during the Compensation Period.

**FEES FOR SERVICES RENDERED
DURING THE COMPENSATION PERIOD**

1. **Exhibit A** sets forth a timekeeper summary that includes the respective names, positions, department, bar admissions, hourly billing rates, and aggregate hours spent by each Bayard professional and paraprofessional that provided services to the Committee during the Compensation Period. The rates charged by Bayard for services rendered to the Committee are the same rates that Bayard charges generally for professional services rendered to its non-bankruptcy clients.

2. **Exhibit B** sets forth a task code summary that includes the aggregate hours per task code spent by Bayard professionals and paraprofessionals in rendering services to the Committee during the Compensation Period.

3. **Exhibit C** sets forth a complete itemization of tasks performed by Bayard professionals and paraprofessionals that provided services to the Committee during the Compensation Period.

EXPENSES INCURRED DURING THE COMPENSATION PERIOD

4. **Exhibit D** sets forth a disbursement summary that includes the aggregate expenses, organized by general disbursement categories, incurred by Bayard in connection with services rendered to the Committee during the Compensation Period.

5. **Exhibit E** sets forth a complete itemization of disbursements incurred by Bayard in connection with services rendered to the Committee during the Compensation Period.

NOTICE OF OBJECTION PROCEDURES

6. Notice of this Fifth Monthly Fee Statement will be given to (i) Purdue Pharma L.P., 201 Tresser Blvd, Stamford, Connecticut 06901, Attn: Jon Lowne (Jon.Lowne@pharma.com); (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn: Christopher Robertson (christopher.robertson@davispolk.com) and Dylan Consla (dylan.consla@davispolk.com); (iii) counsel to the Committee, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, New York 10036, Attn: Arik Preis (apreis@akingump.com); (iv) the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Paul K. Schwartzberg; and (v) the independent fee examiner appointed in these chapter 11 cases, David M. Klauder, Esq., Bielli & Klauder, LLC, 1204 N. King Street, Wilmington, Delaware, 19801 (dklauder@bk-legal.com) (collectively, the “Notice Parties”).

7. Objections to this Fifth Monthly Fee Statement, if any, must be filed with the Court and served upon the Notice Parties and undersigned counsel so as to be received by no later than **November 25, 2020 at 12:00 p.m. (ET)** (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue.

8. If no objections to this Fifth Monthly Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.

9. If an objection to this Fifth Monthly Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Fifth Monthly Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not resolved,

it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: November 11, 2020
New York, New York

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Arik Preis
Ira Dizengoff, Esq.
Arik Preis, Esq.
Sara Brauner, Esq.
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- and -

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*Co-Counsel and Former Co-Counsel to the Official
Committee of Unsecured Creditors of Purdue Pharma
L.P., et al.*

EXHIBIT A

Timekeeper Summary

Attorneys					
Timekeeper	Position	Description	Rate	Hours	Amounts
Erin R. Fay	Director	Director since 2019. Joined firm in 2017. Member of DE and WI Bars since 2009. Areas of Expertise: Bankruptcy and Litigation.	\$575.00	1.1	\$632.50
Sophie E. Macon	Associate	Associate since 2018. Joined firm in 2017. Member of DE Bar since 2018. Area of Expertise: Bankruptcy.	\$400.00	11.9	\$4,760.00
			Totals	13.0	\$5,392.50
			Blended Attorney Rate		\$414.81

Paraprofessionals					
Timekeeper	Position	Description	Rate	Hours	Amount
Kristin McCloskey	Paralegal	Paralegal. Joined firm in 2020. Area of Expertise: Bankruptcy.	\$295.00	3.5	\$1,032.50
			Totals	3.5	\$1,032.50
			Blended Rate for All Timekeepers		\$389.39

EXHIBIT B

Project Category Summary by Task Code

Project Category	Hours	Amount
Bayard Fee Application (F1)	16.5	\$6,425.00
Totals	16.5	\$6,425.00

EXHIBIT C

Invoice

BAYARD, P.A.

600 N. KING STREET, SUITE 400
P.O. BOX 25130
WILMINGTON, DE 19899
(302) 655-5000
FEDERAL ID.# 51-0200788

Purdue Pharma L.P. - Official Committee of Unsecured Creditors
Akin Gump Strauss Hauer & Feld LLP
c/o Arik Preis
One Bryant Park
Bank of America Tower
New York, NY 10036

Invoice 1030616
November 4, 2020

ID: 39352-00001 - JRA

Re: Purdue Pharma L.P. - SDNY

For Services Rendered Through 11/3/2020

Current Fees	6,425.00	
Current Disbursements	<u>10.10</u>	
Total Current Charges		\$6,435.10

Purdue Pharma L.P. - Official Committee of Unsecured Creditors
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Re: Purdue Pharma L.P. - SDNY

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Fees by Task Code				
Date	Description of Services	Atty	Hours	Amount
F1	Bayard Fee Application			
06/08/20	Review fee examiner report re Bayard first interim fee application	SEM	0.60	240.00
06/10/20	Draft Bayard's Fourth Monthly Fee Application	KM	1.10	324.50
06/23/20	Emails w/ ERF re monthly and final fee application	SEM	0.10	40.00
06/25/20	review fee examiner report and begin to prepare response	ERF	0.80	460.00
06/25/20	Emails w/ ERF re Purdue monthly and Final Fee Applications (.2)	SEM	0.20	80.00
06/30/20	Emails w/ ERF re Purdue monthly & final fee applications	SEM	0.20	80.00
07/01/20	Review exhibit re Bayard final fee app	ERF	0.30	172.50
07/01/20	Emails w/ ERF re exhibits to Bayard 4th monthly fee application (.1); review and revise KAM initial draft of Bayard 4th monthly fee app (.8)	SEM	0.90	360.00
07/02/20	Revise/update Bayard Fourth Monthly fee application (.8) and assist S. Macon with preparation of Bayard Final Fee Application (1.6)	KM	2.40	708.00
07/03/20	Review and revise Bayard 4th monthly fee application	SEM	1.80	720.00
07/03/20	Prepare Bayard Final Fee Application (4.4)	SEM	4.40	1,760.00
07/04/20	Continue & complete preparation of Bayard draft final fee application (1.2); review Bayard 4th and final draft fee apps (.2); emails w/ ERF re same (.1)	SEM	1.50	600.00
07/09/20	Review emails w/ E. Lisovicz and ERF re filing of Bayard 4th monthly and final fee applications (.2); review docket in connection with same (.2)	SEM	0.40	160.00
07/11/20	Emails w/ ERF re revisions to Bayard 4th monthly fee application	SEM	0.10	40.00
07/12/20	Review invoice and expense detail re 4th monthly fee app (.3); revise draft 4th monthly fee app to comply w/ interim comp order (.5); emails w/ ERF re same (.1); emails w/ TJ re same (.1)	SEM	1.00	400.00
07/13/20	Emails w/ E. Lisovicz re Bayard 4th monthly fee application (.2); emails w/ ERF re same (.1); review updated exhibits to Bayard 4th monthly fee app (.1); finalize same (.1)	SEM	0.50	200.00
07/15/20	Emails w/ E. Lisovicz and T. Julien re LEDES file for Bayard 4th monthly fee application (.2)	SEM	0.20	80.00
Total Fees				\$6,425.00

Purdue Pharma L.P. - Official Committee of Unsecured Creditors
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Fee Recap by Activity Code

		Hours	Rate	Amount
F1	Bayard Fee Application			
	Fay, Erin R.	1.10	\$575.00	632.50
	Macon, Sophie Elizabeth	11.90	\$400.00	4,760.00
	McCloskey, Kristin	3.50	\$295.00	1,032.50
	Subtotal	16.50		\$6,425.00
	Totals	16.50		\$6,425.00

Disbursements

Disbursement Description	Amount
Print Images	10.10
Total Disbursements	\$10.10

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Monthly Summary of Professional Fees

		Rate/Hour	Hours	Amount
Erin R. Fay	Director	575.00	1.10	632.50
Sophie Elizabeth Macon	Associate	400.00	11.90	4,760.00
Kristin McCloskey	Paralegal	295.00	3.50	1,032.50
		Totals	16.50	6,425.00

Monthly Summary of Fees

June		Hours	Amount
	Bayard Fee Application	3.00	1,224.50
July		Hours	Amount
	Bayard Fee Application	13.50	5,200.50
Totals		16.50	\$6,425.00

Disbursement Summary by Month

June			
	Print Images		10.10
		Total for June	\$10.10
		Total Disbursements	\$10.10

EXHIBIT D

Expense Category Summary

Expense Category	Amount
Print Images	\$10.10
Totals	\$10.10

EXHIBIT E

Expense Detail

BAYARD, P.A.

600 N. KING STREET, SUITE 400
P.O. BOX 25130
WILMINGTON, DE 19899
(302) 655-5000
FEDERAL I.D.# 51-0200788

Purdue Pharma L.P. - Official Committee of Unsecured Creditors
Akin Gump Strauss Hauer & Feld LLP
c/o Arik Preis
One Bryant Park
Bank of America Tower
New York, NY 10036

Invoice 1030616
November 4, 2020

ID: 39352-00001 - JRA

Re: Purdue Pharma L.P. - SDNY

For Services Rendered Through 11/3/2020

Expense Summary

Expense Category	Amount
Print Images	10.10
Total Expenses	\$10.10

Detailed Disbursement Description

Date	Disbursement Description	Amount
06/11/20	Print Images	2.00
07/08/20	Print Images	1.10
07/08/20	Print Images	1.10
07/08/20	Print Images	4.20
07/08/20	Print Images	1.70
Total Disbursements		10.10